

REMARKS

Contrary to the Examiner's assertion in the Advisory Action that the rejection over Chen in view of Eid, Jouan and Whang is maintained because each of the references are in "the field of Multiple Model estimation", the Final rejection indicates that "all these references are in the field of Interacting Multiple Models (IMMs)". The presently claimed invention defines subject matter which is not obvious from the references . It is quite clear that Eid has been cited for disclosing the selecting of one of a plurality of error models as a known variant of IMM approach referring to column 17, line 6 to column 19, line 65, wherein the IMM variant is the third variant.

In order for the Examiner's argument to be persuasive the reference to Eid must be dealing with IMM as stated by the Examiner in the Final rejection which means that it must be dealing with the "third variant" which is discussed at column 18, line 60 through column 19, line 65. Particular attention is addressed to column 19, lines 60-63 which indicates that the estimate output to the outside world is calculated through a "weighted sum using probabilities". Thus, this IMM approach does indeed use weighted sum consideration which is contrary to the assertion that the secondary references teach "using output selection instead of weighted combinations of outputs" (Item 1 last paragraph on page 2 of the Office Action).

The other secondary reference to Jouan is stated by the Examiner at the second paragraph on page 4 as disclosing that "a multiple model that selects

among model outputs (3CV-PAR) will perform reasonably for many applications, and its simplicity and its low computational load **compared to IMM** make it preferable for these applications". Once again, it is submitted that Jouan does not disclose what the Examiner indicates it discloses. That is, in the case of Jouan it discloses a selection of model outputs which is indicated as having advantages when "**compared to IMM**" and thus, making it **preferable to IMM**. Therefore, Juan is not addressed to IMM, contrary to the Examiner's assertion that "all these references are in the field of Interacting Multiple Models (IMM)".

The final secondary reference to Whang has been disclosed for selecting among multiple models to produce a more accurate output than IMM. Without further discussing the reference to Whang aside from its previous discussion in the August 24, 2005 response, it can quite easily be seen that Whang is also contrary to the Examiner's assertion that all of the references are concerned with IMM.

Because not all of the references are concerned with IMM because they provide alternatives to IMM not "known variants of the IMM approach" as alleged by the Examiner these references are not obviously able to be combined to one of ordinary skill in the art even if it is accepted that the standard for field of the art is IMM among the references. Of course, Applicants reiterate their position that the references are also not combinable because neither Eid, Jouan or Whang are related to determining the problem of estimated navigational signal error information as is specifically recited in the each of the independent

claims of the present invention. Any combination of references does not yield an estimation of navigational signal error information. However, as indicated previously, even the Examiner's standard for "related art" is not met by the references. If it is the examiner's new position that the claims are obvious are obvious because the references are all Multiple Model estimation, then Applicants submit that it does not correspond to the Final Rejection and furthermore, the basis for combining references is not only that they are in the same field but that they must not provide contradictory results when combined. As has been discussed Jouan provides a result which Jouan indicates is preferable to IMM because it has advantages when compared to IMM. Therefore there is a motivation **NOT** to combine the reference.

Independent claim 12 is an apparatus corresponding to method claim 1 and independent claim 14, aside from reciting limitations of independent claim 12 also recites the determination of the estimated navigational error information while applying the selected error module of the received navigation signals and controlling the transmission of determined error information to the radio navigation system. Once again, there is no showing of this feature in any of the references even if, for purposes of arguments, the references could be combined.

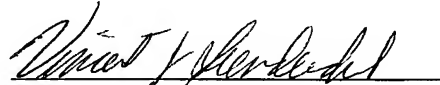
Allowance of this application is accordingly requested containing claims 1-20.

If there are any questions regarding this Preliminary Amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket # 010408.52704US).

Respectfully submitted,

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